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CORRES. CONTROL
INCOMING-LTR. NO.

United States Government

Department of Energy

Rocky Flats Office

1576 RF 89
Memorandum

DATE: OCT 24 1989

TO: EPD:MVDP

SUBJECT: Outstanding RCRA Issues

FROM: Dominick J. Sanchini
President
Rockwell International, RFP

Over the past couple of months several unrelated issues pertaining to RCRA have been identified. Followup in terms of RFO concurrence, guidance, and verification is warranted. The followup is provided below, listed by subject:

1. Monitoring of Building 374 evaporator effluent. The August 22, 1989 letter from RFO to CDH pertaining to evaporator restart identified monitoring requirements. Further discussions with Mr. Fred Dowsett (CDH) has confirmed the intent of the requirements to mean those listed in 40 CFR 141, Subpart B (with exception of turbidity and microbiological contaminants) and for the initial analysis, the 83 contaminants listed in May 22, 1989 Federal Register (Vol. 54, No. 97, page 22140), again with exception of turbidity and microbiological contaminants. Following initial analysis for the 83 contaminants, we need to continue monitoring for only those contaminants detected. Please submit the monitoring plan and initial results for the months of August and September by October 30, 1989 (provided sample results are available).

2. Unplanned Events. We concur that the dioxane removal incident of October 17, 1989 does not require implementation of the RCRA contingency plan. However, the location where the material is now temporarily stored must be added to the contingency plan. A one page addendum would be sufficient for this purpose.

3. Building 371 recovery operations TRU waste (ref. 89-RF-3130). We concur with your conclusion that the dry wipes previously saturated with acids or bases are not RCRA regulated provided you can demonstrate the waste has no other hazardous characteristic or constituent. However, your discussion of the inapplicability of regulation to the anhydrous hydrogen fluoride is weak if based solely on the documented discussions with CDH (your attachments).

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4. Segregation of TRU and TRU-mixed waste (ref. 89-RF-2841). We do not understand the proposal to relabel unsegregated TRU-mixed waste as TRU waste. However, we believe this issue may be incorporated in the pending Compliance Order pertaining to residues. In this regard, please ensure the appropriate Rockwell staff is involved in staff level discussions.

5. General Concerns. Correspondence related to RCRA issues is apparently now generated in several different Rockwell organizations; we recommend that all such correspondence be routed through RCRA/CERCLA in order to assure program continuity. We also suggest the identification of staff contacts on all correspondence related to environmental issues in order to facilitate better communication between RFO and Rockwell.

We appreciate your attention to these matters. If you have any questions please contact either myself or have your staff contact Mark E. Van Der Puy, of my staff at extension 2473.


David P. Simonson
Manager

cc:

K. B. McKinley, Rockwell
E. R. Naimon, Rockwell